

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 23-158 (SRN/TNL)**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	DEFENDANT TILLMAN’S
)	PROPOSED VOIR DIRE
v.)	
)	
TRAIGH SEAN TILLMAN)	
)	
Defendant.)	

Defendant, Traigh Sean Tillman, by and through his attorney, Thomas H. Shiah, respectfully submits the following proposed general voir dire questions, and request they be asked of the prospective jurors under the procedures set forth in Rule 24(a) of the Federal Rules of Criminal Procedure. In addition, the undersigned counsel further respectfully requests that counsel be allowed to participate in the jury voir dire.

CASE-SPECIFIC ISSUES

1. Have you heard of this case before today? If so, what did you hear?
2. Do you know any of the other prospective jurors here with you today?
3. Do you know anyone who works at the United States Attorney’s Office, the Federal Bureau of Investigation (FBI) or any other federal or state agency?
4. Have you had any contact with any federal or state agency? If so, please describe the contact.
5. Do you know any of the witnesses in this case?

PERSONAL BACKGROUND

6. What is your occupation? And, if you’re retired, what was your occupation before retiring? (Again, please provide the same information as to your spouse and children.)

7. Where were you born and raised?
8. Briefly describe your educational background, including where you went to high school, whether you went to college, and what degrees or certificates you have.
9. Have you ever served in the armed forces? Please describe.
10. What are your favorite activities or interests outside of work? Do you belong to any clubs or organizations? How active are you in those groups?
11. Do you have any religious or philosophical beliefs which would make it difficult for you to be a fair and neutral juror in this case?

FIREARM ISSUES

12. Do you or any of your family members own any firearms? If so, for what purpose?
13. Are there any firearms in your home or place of work?
14. Do you feel there should be more laws restricting the possession of firearms? If so, please explain.
15. Do you feel there are too many laws restricting the possession of firearms? If so, please explain.

RACE ISSUES

16. Do you have a particular opinion or anything that you associate with the minority communities in the Twin Cities?
17. Are there any areas of the Twin Cities you avoid? If so, where and why?
18. Is there anyone who believes that, to even the slightest degree, certain people are more likely than others to commit crimes? If so, who do you think that is?
19. Is there anyone who feels that there is no longer any racial bias or prejudice against people of color in this country?

20. Do you have any views about African Americans and the African American community in Minnesota? If so, what are they?
21. Have you had any personal experience, good or bad, with African Americans?
22. Will your views concerning African Americans in any way affect your ability to fairly and impartially presume Mr. Ferguson innocent?

GANG ISSUES

23. Have you or anyone you know had any previous contacts with any street gangs in the Twin Cities?
24. Are there any areas in the Twin Cities you avoid as a result of possible gang activity?
25. Do you or anyone you know have any affiliation, association or membership of any street gang?
26. Do you feel their association with people who may be members of street gangs would make an individual more likely to commit crimes?

CRIMINAL JUSTICE EXPERIENCE

27. Have you or anyone you know ever had any previous contacts with the criminal justice system, either as the victim of a crime, a person accused of a crime, or a witness to a crime? If so, tell us about that.
28. Have you, or anyone you know had any contact with federal, state or local police or prosecutors? If so, please tell us about that.
29. Several of the witnesses in this trial are likely to be law enforcement officers. Do you have strong prejudices either against or in favor of law enforcement officers?
30. Do any of you believe that a law enforcement officer is more likely to tell the truth than other people? Can you follow the Court's instruction that you must treat the law

enforcement officers' testimony the same way as other witnesses?

31. Do you know any police officers or other people who work in law enforcement? If so, please tell us about that.

PRIOR JURY/LEGAL EXPERIENCE

32. Have you served as a juror in state or federal court in any civil cases or any criminal cases? If so, please tell us about that.
33. Was there anything about your previous experience that would lead you to feel that you may have some feelings either for or against the prosecution or the defense?
34. Do you have any legal training? Have you taken any law courses?
35. Do you know any lawyers or judges, or people employed in any way in the legal profession?
36. Have you ever been a witness in court or in a deposition?

FOLLOWING INSTRUCTIONS AND PRESUMPTIONS

37. How important is the rule that a person accused of a crime is presumed innocent?
38. Are you able to believe the defendants in this case are innocent of the charges in the indictment as you sit here today?

CONCLUDING QUESTIONS

39. As you sit here today, do you have any opinion about this case or as to what the result in this case should be?
40. Do you have any mental or physical condition which would make it difficult for you to sit as a juror?
41. Is there anything about this case which causes you to have any feelings of prejudice or sympathy one way or the other?

42. Is there anything else the Court or the lawyers should know about your ability to be fair and impartial juror in this case?

Respectfully submitted,

Dated: January 3, 2024

**LAW OFFICES OF
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